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CHARLES ELMORE CROPLEY

IN THE

Supreme Court of the United States

OCTOBER TERM, 1946

No. 305 19

NEPTUNE METER COMPANY,

Petitioner,

—against—

NATIONAL LABOR RELATIONS BOARD.

No. 306 20

NEPTUNE METER COMPANY,

Petitioner,

—against—

NATIONAL LABOR RELATIONS BOARD.

No. 317 22

INDEPENDENT EMPLOYEES' ASSOCIATION OF THE NEPTUNE METER COMPANY,

Petitioner,

—against—

NATIONAL LABOR RELATIONS BOARD.

ON PETITION FOR WRITS OF CERTIORARI TO THE UNITED STATES CIRCUIT COURT OF APPEALS FOR THE SECOND CIRCUIT

REPLY MEMORANDUM OF NEPTUNE METER COMPANY

EDWARD L. COFFEY,
Counsel for Petitioner.

IN THE

Supreme Court of the United States

OCTOBER TERM, 1946

No. 905

NEPTUNE METER COMPANY,

Petitioner,

—against—

NATIONAL LABOR RELATIONS BOARD.

No. 906

NEPTUNE METER COMPANY,

Petitioner,

—against—

NATIONAL LABOR RELATIONS BOARD.

No. 917

INDEPENDENT EMPLOYEES' ASSOCIATION OF THE NEPTUNE METER COMPANY,

Petitioner,

—against—

NATIONAL LABOR RELATIONS BOARD.

ON PETITION FOR WRITS OF CERTIORARI TO THE UNITED STATES CIRCUIT COURT OF APPEALS FOR THE SECOND CIRCUIT

REPLY MEMORANDUM OF NEPTUNE METER COMPANY

To the Honorable, the Chief Justice of the United States and the Associate Justices of the Supreme Court of the United States:

NEPTUNE METER COMPANY, Petitioner in Nos. 905 and 906, respectfully urges that writs of certiorari be granted in the above entitled cases for the following reasons:

1. The Memorandum of the National Labor Relations Board filed in this case admits the existence of a conflict between the Circuit Courts of Appeals which have dealt with the question of the conclusiveness of the Board's findings as to company-domination of successor unions.

2. Your Petitioner will undertake to file briefs in Nos. 905 and 906 within seven (7) days after the granting of writs of certiorari and will waive any requirement that the Solicitor General's briefs be filed a week prior to argument and will consent that the same be filed at any time prior to or after argument.

3. Petitioner will be prepared for oral argument in Nos. 905 and 906 concurrently with oral argument in *National Labor Relations Board* v. *Keystone Steel & Wire Company, et al.*, October Term, 1946, No. 544, which oral argument Petitioner presently understands will be held during the first week in March, 1947.

WHEREFORE, Petitioner respectfully urges this Court to grant writs of certiorari and to afford Petitioner an opportunity to be heard.

NEPTUNE METER COMPANY,
Petitioner.

By EDWARD L. COFFEY,
Counsel for Petitioner.

February 8, 1947.